

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

CHARLENE CARTER,

Plaintiff

V.

SOUTHWEST AIRLINES CO., AND  
TRANSPORT WORKERS UNION  
OF AMERICA, LOCAL 556,

## Defendants

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Civil Action No. 3:17-cv-02278-X

## UNOPPOSED MOTION TO WITHDRAW AS COUNSEL FOR PLAINTIFF

Movant Jason E. Winford (“Movant”) files this Unopposed Motion to Withdraw as Counsel for Plaintiff Charlene Carter and in support respectfully states as follows:

Movant previously represented Plaintiff as local counsel while employed with the law firm of Jenkins & Watkins, P.C. However, Movant has recently changed law firms and is unable to continue to represent Plaintiff in this matter.

There is good cause for this Court to grant the Motion to Withdraw because Movant recently left the law firm of Jenkins & Watkins, P.C., and joined another law firm, Gordon Rees Scully Mansukhani, LLP, where Movant is unable to continue representing Plaintiff in this matter.

Plaintiff will continue to be ably represented by Matthew B. Gilliam of the National Right to Work Legal Defense Foundation, Inc., who has represented Plaintiff from the beginning of this matter as Plaintiff's primary counsel. Plaintiff will also be ably represented by Bobby G. Pryor and Matthew D. Hill of Pryor and Bruce, both experienced attorneys who have been retained to

represent Plaintiff as local counsel in this lawsuit going forward, and who filed their Appearance of Counsel on June 1, 2022 (Doc. 238).

Plaintiff approves the withdrawal of Movant, and Defendants do not oppose this Motion.

This withdrawal will not prejudice the parties or delay these proceedings.

### **Conclusion**

For the foregoing reasons, Movant Jason E. Winford respectfully requests that the Court grant his Motion to Withdraw as Counsel for Plaintiff.

Respectfully submitted,

/s/ Jason E. Winford

Jason E. Winford

Texas Bar No. 00788693

*jwinford@grsm.com*

GORDON REES SCULLY

MANSUKHANI, LLP

2200 Ross Avenue, Suite 3700

Dallas, Texas 75201

Telephone: (214) 231-4760

Facsimile: (214) 461-4053

*Withdrawing Attorney for Plaintiff*

### **Certificate of Conference**

Movant and Counsel for Plaintiff has conferred with counsel for Defendants regarding this Motion, and Defendants do not oppose the Motion.

/s/ Jason E. Winford